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Before the
Federal Communications Commission
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In the Matter of	)	
Focused Comment on	)	
Modernizing the E-rate	)	W.C. Docket No. 13-184
Program for Schools and Libraries	)	

COMMENTS OF THE KENTUCKY DEPARTMENT FOR LIBRARIES AND ARCHIVES
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The Kentucky Department for Libraries and Archives (KDLA) is grateful for the opportunity to submit comments on this public notice. KDLA strongly supports the Federal Communications Commission (FCC) as it moves to modernize the E-rate program.

Background

KDLA actively supports public library service in all 120 counties in the Commonwealth of Kentucky. These public libraries serve the state's population of 4.37 million residents. Demand for public library service is at near-record levels[1], and libraries are managing this demand with declining budgets. KDLA has provided direct aid to public libraries for 62 years. However, the amount of state aid has decreased by nearly one-third (32%) since 2008[2]. Local support for public libraries

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[1] *See* Kentucky Department for Libraries and Archives, Statistical Report for Kentucky Public Libraries: Fiscal Year 2011-2012, *available at* http://kdla.ky.gov/librarians/plssd/Documents/KDLA1112.pdf (last visited April 6, 2014).
[2] Email message from Charlene Davis, Acting Director, Field Services Division of KDLA received on August 9, 2013.

has also declined or plateaued in that time[3]. Public libraries rely on federal grants and other programs such as E-rate to make up the difference. Participation in the E-rate program has increased by 53% since 2008.

These comments are informed by KDLA's experience as the prime recipient of a Broadband Technology Opportunities Program (BTOP) Public Computing Center (PCC) grant. Combined with support from the Bill and Melinda Gates Foundation, $1.74 million in grant funds enabled 46 public library sub-recipients to purchase over $1 million in much-needed network and end-user equipment. An outside IT consultant provided on-site evaluations that laid the groundwork for a very successful program. 78% of sub-recipients increased their connectivity during the project.

High-Capacity Broadband in Kentucky Public Libraries

KDLA applauds the FCC for pursuing increased investment in high-capacity broadband. In a recent survey of the 91 Kentucky public libraries participating in the E-rate program, 3.3% of the state's public libraries (4 total) reported connection speeds of 100 Mbps or greater. Only one library, the largest in the state with 18 locations, has plans to upgrade to a Gigabit connection in the next year. The average connection speed for the remaining public libraries is 14.2 Mbps. In addition, 45% of Kentucky public libraries reported connection speeds of 10 Mbps or less, and 3 libraries reported connection speeds at 1.5 Mbps or below[4].

Priority 2 Funding in Kentucky

KDLA supports the FCC in its efforts to improve on the current method of distributing Priority 2 funds. Kentucky's public libraries would benefit greatly from increased availability of Priority 2 funding. The average Kentucky public library building was built in 2000, and a third of the state's buildings were constructed in 1999 or earlier[5]. These older structures could require significant investments in Internal Connections.

Between FY2008 and FY2013, the funding commitments for the state's public libraries totaled $5,413,492.59. During the five-year same period, less than ½ of 1% of the total, or $20,311.06, was committed for Priority 2 services. If barriers to Priority 2 funding were removed and funds were available below the 90% discount level, adoption rates for high-speed broadband have the potential to increase significantly.

Access to Priority 2 Funding

In ¶ 14-22, comment is sought on three potential methods of distributing Priority 2 funding. An informal survey of public library IT managers[6] indicated a strong preference for an annual allocation for Internal Connections. Representatives of smaller library systems were most supportive of this approach. Reasons cited were convenience for the applicant, especially in terms of budgeting and in terms of keeping track of their institution's eligibility. Some that supported this method indicated they would prefer the capability to carry over unused funds from one year to the next.

Other IT managers were in favor of aligning Priority 2 funding to a five-year upgrade cycle. Typically from larger library systems with multiple locations, these respondents indicated that their networking needs were complex enough that a small amount of annual funding would not be useful to them. None of the respondents favored the rotating eligibility plan.

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[3] Email message from Jay Bank, State Data Consultant, KDLA received on August 12, 2013.
[4] Email messages from staff at 80 public library E-rate participants, received between August 8 and September 13, 2013.
[5] Email message from State Construction Consultant, KDLA, received September 12, 2013.
[6] Email messages from public library IT managers, received between March 31 and April 3, 2014.

KDLA supports an annual allocation for Internal Connections. An estimated 64% of the state's public libraries do not have in-house IT staff, and lack the capacity to plan on a 5 year cycle. These smaller, predominantly rural libraries would derive the most benefit from reliable Priority 2 funding. An annual allocation of funds would facilitate regular consultations with outside IT providers for network assessments and technology planning.

Kentucky's public libraries have limited experience with Priority 2 funding. Only 4 of the state's 120 libraries have received commitments for Internal Connections funding in the past 5 years. This lack of experience will be a significant barrier for the small libraries with limited resources that could most benefit from increased Priority 2 funding. An annual allocation would streamline program administration and reduce confusion among applicants.

Encouraging Cost-Effective Purchasing

KDLA opposes preferential treatment for consortia applicants. At this time, most of the state's public libraries are not participating in consortia or cooperative purchasing agreements. However, Kentucky public libraries, as political subdivisions of the state, are eligible to purchase Internet services off State Master Agreements (SMA's).

In the 1990s, a public-private partnership between state agencies and telecommunications carriers formed the Kentucky Information Highway consortium, or KIH. A SMA was established, and Kentucky public libraries were eligible to purchase Internet services off the SMA. KIH was instrumental in bringing Internet access to large areas of the Commonwealth, but as service provider competition increased, most public libraries found it more cost-effective to leave the consortium.

Currently only two public libraries purchase off the most recent incarnation of the KIH SMA. These libraries are two of the largest in the state, with complex networking needs. The majority of public libraries participating in the E-rate program have only one location and no in-house IT staff, and are not currently participating in consortia or buying from SMA's. The primary motivation for leaving the consortium was the ability to procure services at lower prices than those specified in SMA's.

Reduced Support for Voice Services

KDLA is strongly opposed to eliminating support for voice services in 2015 as proposed in ¶ 46. In Kentucky, Voice over Internet Protocol (VoIP) is not yet considered a viable alternative to public-switch telephone service. Communications from staff in KDLA's regional offices and public library staff indicate that Internet access can be unreliable in the Southeastern region of the state[7]. Mountainous terrain and a lack of infrastructure provide challenges in this region.

KDLA recognizes that VoIP is becoming standard in many areas of the country. However, until infrastructure improvements are made, Kentucky's public librarians will be reluctant to divert scarce resources to switch from well-established POTS to a system that is more expensive and less reliable.

KDLA strongly supports the proposal in ¶ 43 to adopt different phase-out dates for support for voice services dependent on when an applicant gains access to high-speed broadband. KDLA also supports the comments cited in ¶ 52; support for traditional voice services should be extended for those in remote rural areas, or in any area that lacks access to high-capacity broadband and would find it more challenging to adopt affordable VoIP options.

Eliminating support for voice service would present a significant hardship to the state's public libraries. Nearly one quarter of Kentucky public libraries' current E-rate commitments support plain old telephone service (POTS). A gradual phase-out of voice services is the only sustainable option for the state's public libraries.

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[7] Email messages from staff at 80 public library E-rate participants, received between August 8 and September 13, 2013.

Demonstration Projects

KDLA supports the American Library Association's proposal for a pilot program aimed at advancing library services by increasing access to high-capacity broadband. Kentucky's public libraries report skyrocketing demands on their wireless networks, with some locations registering several thousand wireless users each month[8]. A pilot project that increases funding for broadband deployment, Internal Connections, and technical assistance could greatly benefit Kentucky's public libraries.

KDLA has direct experience with the benefits of increased technical assistance cited in ¶ 59. KDLA's BTOP grant benefitted from multiple on-site visits from a consultant from Pomeroy IT Solutions, Inc. Many sub-recipients lacked dedicated IT staff or regular contracts for IT support. In several cases, libraries with no expertise or IT staff entered into contracts for IT support for the first time, resulting in dramatic improvements. One library in particular provided an excellent illustration of the power of combining a network assessment with local IT assistance.

The Hardin County Public Library serves one of the state's largest counties (population 107,456) with a very tight budget. At the start of the BTOP grant, the library had no IT expertise on staff, no contract for IT support, and numerous computers that were out of order. The outside IT consultant contracted by KDLA visited the library and made suggestions for improvements and equipment upgrades. Though the equipment upgrades proved very beneficial, the most important outcome was that the process demonstrated to the director the value of having quality IT support available. In this instance, the consultant was able to recommend an IT support provider in the area, who is now on call. The library is now proactively planning for their future technology needs.
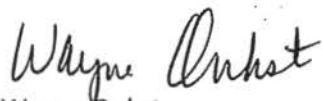
Conclusion

In summary, KDLA:

- Strongly supports increased access to funding for Internal Connections. Kentucky's public libraries report skyrocketing demands on their wireless networks. Meanwhile, a third of the state's buildings were constructed in 1999 or earlier. These older structures will require significant investments to support increasing demands on network equipment.
- Supports an annual allocation of Priority 2 funds. This approach will streamline program administration and reduce confusion among applicants. It will also facilitate technology planning for the 64% of Kentucky public libraries that lack IT staff.
- Opposes preferential treatment for consortia applicants. Currently only two of the state's largest public libraries are purchasing services off State Master Agreements (SMA's). Both have complex networking needs and talented IT staff to assist in the procurement process. Most public libraries find it cost-effective to purchase services outside of SMA's.
- Strongly supports adopting different phase-out dates for support for voice services dependent on when applicants gain access to high-speed broadband. VoIP is not yet considered a viable alternative to public-switch telephone service in many areas of the state.
- Strongly supports the creation of a pilot program focused on expanding access to high-capacity broadband. The American Library Association's proposal will catalyze innovation and advance public library service.

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[8] Email messages from public library IT managers, received between March 31 and April 3, 2014.

The Kentucky Department for Libraries and Archives supports the FCC's efforts to modernize the E-rate program to address the 21st century technology needs of Kentucky public libraries. KDLA and the Commonwealth's public libraries stand ready to help the FCC achieve its goals.

Respectfully submitted,

Wayne Onkst
State Librarian and Commissioner
Kentucky Department for Libraries and Archives